

Neel Chatterjee (SBN 173985)
nchatterjee@goodwinlaw.com

James Lin (SBN 310440)
jlin@goodwinlaw.com

GOODWIN PROCTER LLP
135 Commonwealth Drive
Menlo Park, California 94025
Tel.: +1 650 752 3100
Fax.: +1 650 853 1038

Brett Schuman (SBN 189247)
bschuman@goodwinlaw.com

Shane Brun (SBN 179079)
sbrun@goodwinlaw.com

Rachel M. Walsh (SBN 250568)
rwalsh@goodwinlaw.com

Hayes P. Hyde (SBN 308031)
hhyde@goodwinlaw.com

GOODWIN PROCTER LLP
Three Embarcadero Center
San Francisco, California 94111
Tel.: +1 415 733 6000
Fax.: +1 415 677 9041

Hong-An Vu (SBN 266268)
hvu@goodwinlaw.com

Todd A. Boock (SBN 181933)
tboock@goodwinlaw.com

GOODWIN PROCTER LLP
601 S. Figueroa Street, 41st Floor
Los Angeles, California 90017
Tel.: +1 213 426 2500
Fax.: +1 213 623 1673

Attorneys for Defendant: Otto Trucking LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING LLC'S
AMENDED ADMINISTRATIVE MOTION
TO FILE UNDER SEAL**

Courtroom: 8 (19th Floor)

Judge: Hon. William Alsup

Trial Date: December 4, 2017

Filed/Lodged Concurrently with:

1. Declaration ISO Admin. Mot. to File Documents Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this amended administrative motion for an order to file under seal portions of its Opposition to Waymo’s Second Supplemental Brief in Support of its Motion for Order to Show Cause [Dkt. 2054] (the “Administrative Motion”). Specifically, Otto Trucking requests an order granting leave to conditionally file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Parties Claiming Confidentiality
Otto Trucking’s Opposition to Waymo’s Second Supplemental Brief in Support of its Motion for Order to Show Cause [Dkt. 2054]	Highlighted portions	Plaintiff
Exhibit A to the Walsh Declaration	Entire document	Plaintiff Defendants

The highlighted portions of Otto Trucking’s Motion and the entirety of Exhibit A allegedly contain information that Plaintiff Waymo LLC (“Waymo”) and Defendants Uber Technologies Inc. and Ottomotto LLC (collectively “Defendants”) have designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking has no position as to whether the confidentiality designations are appropriate.

Otto Trucking anticipates that Waymo and Defendants will file any necessary declarations to seal the above information pursuant to Local Rule 79-5.

Otto Trucking’s request to seal is narrowly tailored to those portions of the Administrative Motion and its supporting documents that merit provisional sealing based on Waymo’s designations.

Dated: October 30, 2017

Respectfully submitted,

By: /s/ Neel Chatterjee
 Neel Chatterjee
nchatterjee@goodwinlaw.com
 Brett Schuman
bschuman@goodwinlaw.com
 Shane Brun
sbrun@goodwinlaw.com
 Rachel M. Walsh

rwalsh@goodwinlaw.com

Hong-An Vu

hvu@goodwinlaw.com

Hayes P. Hyde

hhyde@goodwinlaw.com

James Lin

jlin@goodwinlaw.com

GOODWIN PROCTER LLP

Attorneys for Defendant: Otto Trucking LLC

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **October 30, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **October 30, 2017**.

/s/ Neel Chatterjee
NEEL CHATTERJEE